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10 UNITED STATES DISTRICT COURT
11 DISTRICT OF NEVADA

12 JOE SMITH, an individual;

13 Plaintiff,

14 vs.

15 NICHOLAS & CO. FOODSERVICE, LLC;
16 DOES I through V; and ROE
17 CORPORATIONS vi through X, inclusive;

18 Defendants.

CASE NO: 2:18-cv-00256-KJD-CWH

19 **STIPULATION AND [PROPOSED] ORDER**
20 **TO EXTEND TIME FOR PLAINTIFF**
21 **TO RESPOND TO DEFENDANT'S**
22 **MOTION FOR SUMMARY JUDGMENT**
23 **AND TO EXTEND TIME FOR**
24 **DEFENDANT TO REPLY**
25 (First Request)

26 COMES NOW, Plaintiff, JOE SMITH (hereinafter "Plaintiff"), by and through his
27 counsel, Trevor J. Hatfield, of Hatfield & Associates, Ltd., and Defendant, NICHOLAS & CO.
28 FOODSERVICE, LLC. (hereinafter "Defendant"), by and through its counsel, Anne T. Freeland,
Esq. of MICHAEL BEST & FRIEDRICH, LLP, and do hereby stipulate and agree to an
extension of time for Plaintiff to respond to Defendant's Motion for Summary Judgment (ECF
#17), that was filed on December 10, 2018, and an extension for Defendant to reply.

The reasons the extension is requested is that Plaintiff's response is due on December 31,
2018, which is in the middle of the holiday season. In addition, Plaintiff's counsel has a
Mediation scheduled for December 21, 2018, in a Federal Court matter.

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1 This request is submitted pursuant to LR IA 6-1, 6-2 and LR II 7-1 and 26-4 and is the
2 parties' first request for an extension of the time for the parties to respond to dispositive motion
3 response deadlines. Accordingly, Plaintiff shall have up to and including January 18, 2019 to
4 respond to Defendant's Motion for Summary Judgment (ECF #17) and Defendant shall have up
5 to and including February 1, 2019, to reply.
6

7 Dated this 13th day of December 2018.

Dated this 13th day of December 2018.

8 HATFIELD & ASSOCIATES, LTD.

MICHAEL BEST & FRIEDRICH, LLP

9 /s/ Trevor J. Hatfield

/s/ Anne T. Freeland

10 By: _____

By: _____

11 Trevor J. Hatfield, Esq.

Anne T. Freeland, Esq.

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16 Attorney for Plaintiff

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18
19 **IT IS SO ORDERED.**

20
21 
22 _____
UNITED STATES DISTRICT JUDGE

23
24 DATED: _____ December 17, 2018.